

Testimony of Robert B. Finucane PE, F.ASCE retired civil engineer. 2/14/17 1/2

Please consider the following comments on H92, Registration of Dams

1080 (3). Makes anybody an interested person whether or not they have any interest.

1105 (b) Department has to determine who the owner of the dam is. This can be difficult and expensive.

1107 generally. Assessment of a hazard potential classification would be a government action which would be subject to appeal by any person (defined above as anybody) for over 1000 dams.

1108 generally. The State will tell dam owners who they are. Again, difficult and expensive to discover, a determination of ownership would be an appealable action.

1108 (1)-(4) is a new hazard class system and it is not the same as the hazard class system in 1108(c). No important difference between low hazard and negligible hazard.

1110. (2) (A-D) Rulemaking of engineering standards is unnecessary. No dam ever failed by conforming to the wrong set of engineering standards.

Section 3 generally. Should include a report on the number and results of dam inspections conducted by hazard classification.

Section 3 requires a report on the registration program 1/1/19 before the registration program begins (Section 5) on 7/1/19.

Comments on the legislation in general

There is no urgent need to change Chapter 43, as it works.

Dam safety is not a regulatory problem, it's a public works problem.

A few remarks on registration fees.

You can't raise money for the dam program faster than the agency can take away general funds.

Charging low hazard dam owners \$200 based on a 1 in 5 year inspection which results in report that can be filed in the town land records is unlikely, uneconomic, and unfair.

Moneys collected by the registration fee are trivial compared to the need.

